

To: Cheryl (Cheri) Vocelka[cvocelka@blm.gov]
From: Todd, Marci
Sent: 2017-05-05T22:03:29-04:00
Importance: Normal
Subject: Fwd: revised Brief Memo, Brief Paper for So. Nevada RMP
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[Briefing Paper\(2\)-So Nevada RMP.docx](#)
[briefing memo\(7\) So NV Supplemental RMP.docx](#)

Please print for me. M

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From: **Pritchett, David** <dpritchett@blm.gov>
Date: Thu, May 4, 2017 at 4:41 PM
Subject: revised Brief Memo, Brief Paper for So. Nevada RMP
To: "Morris, Nathan" <namorris@blm.gov>
Cc: Marci Todd <m1todd@blm.gov>, Serena Sweet <ssweet@blm.gov>, "Cook, Christopher" <cjcook@blm.gov>, Erick Kurkowski <ekurkowski@blm.gov>

per attached
Nathan, please process and coordinate there.

These are the 2 revised Briefing Memo and Briefing Paper, for the package in DTS... for the Fed Reg NoI for the Southern Nevada Supplemental Draft RMP/EIS.
The requested revisions or edits came from Britta Nelson, so as discussed last week, those side comments remain visible in the docs and the topics were addressed in the text body of the Memo.

thanks... and I would appreciate a quick reply to acknowledge.

David Pritchett (not "Dave")
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**INFORMATION / BRIEFING MEMORANDUM
FOR THE ASSISTANT SECRETARY LAND AND MINERALS MANAGEMENT**

DATE: **May 5, 2017**

FROM: Michael D. Nedd, Acting Director Bureau of Land Management
Marci Todd, Acting Nevada State Director

SUBJECT: Supplemental Draft Resource Management Plan covering the Southern Nevada District Planning Area, including Gold Butte National Monument

The purpose of this memo is to provide a status update on the Supplemental Draft Resource Management Plan (RMP) for the Southern Nevada District Planning Area and to confirm approval for publication of a Notice of Intent in the Federal Register to re initiate this planning effort via a Supplemental Draft RMP.

KEY FACTS

Jobs: Management decisions such as permits, available recreational activities, and land disposals arising out of the land use planning process may affect numerous jobs in the region, especially by providing certainty for business decisions and local government planning. The socio economic impact analysis in the RMP will address the effects on regional basis; however, detailed analyses would be conducted through subsequent project specific NEPA reviews.

Stakeholder Positions: Discussed below under the descriptions of *Prominent Issues and Positions of Interested Parties*.

Public Lands Affected: Approximately 3.0 million acres located in Clark County and the southern portion of Nye County (see maps attached and *Background* below).

BACKGROUND

The RMP covering the BLM Southern Nevada District Planning Area is under revision from its prior version completed in 1998. The Planning Area encompasses approximately 3.0 million acres, located in Clark County and the southern portion of Nye County (see map attached). The Las Vegas metro area (population 2.3 million) is situated in the center of the Planning Area, accentuating the intensive public interest in BLM activities and management there.

The Planning Area surrounds but does not cover several NLCS units, including Red Rock Canyon National Conservation Area, Sloan Canyon National Conservation Area, and Old Spanish National Historic Trail, all of which have their own separate management plans. The RMP is examining five waterways for Wild and Scenic River eligibility and status. The RMP does not cover private lands, State lands, Indian reservations, National Park Service and other Federal

lands not administered by the BLM, or Nellis Test and Training Range (U.S. Air Force).

The RMP process is currently between the public Draft and the Administrative Final RMP phases. The Proposed RMP and Final Environmental Impact Statement (EIS) that has been under development was paused for internal review in July 2016. This procedural pause was based upon concerns and issues raised by our many partners, stakeholders, and the public affected by this RMP (see *Discussion* below). During the latter half of 2016, the Nevada State Office coordinated with the Washington Office Planning Division and the Solicitors, and determined that a Supplemental Draft RMP/EIS, with a new 60 day public scoping period, would be the best approach to address the concerns and issues raised.

The Supplemental Draft RMP/EIS will also address the recent designation of the Gold Butte National Monument (GBNM), which covers 296,937 acres in the planning area. As required under BLM Manual 6220, the Division of National Conservation Lands was consulted about the planning approach for GBNM and concurs, in accordance with BLM Manual 6220, that GBNM could be incorporated into a single RMP with separate Records of Decision published for GBNM and the remainder of the Planning Area.

The GBNM portion of the Planning Area (see attached map) will be analyzed under the Special Designations section of the RMP, consistent with standard organization of RMP documents. On February 9, 2017, the BLM Southern Nevada District Office conducted a public information meeting about GBNM, held at Mesquite City Hall, in Mesquite, Nevada, with about 180 participants and extensive news coverage. An additional public information meeting was held on March 29, 2017, at Moapa Valley Town Advisory Board, an unincorporated community near the western boundary of GBNM, and an additional public information meeting will occur May 25 at North Las Vegas City Hall.

- Draft RMP, public documents in ePlanning, Land Use Register
http://eplanning.blm.gov/epl_fron_office/planAndProjectSite.do?methodName_renderDefaultPlanOrProjectSite&gpmjccfd_2900
- Gold Butte National Monument webpage, including a map and the designating Proclamation
https://www.blm.gov/gold_butte

DISCUSSION

Supplemental Draft RMP/EIS

The purpose of the supplemental public scoping process is to incorporate substantive comments received since the initial Draft RMP/EIS was made available in October 2014 for public and Cooperating Agency review, and to incorporate new information, field data, and changing circumstances, such as recent Federal land transfers, designation of the GBNM, and the BLM Final Solar and Wind Rule (November 10, 2016). Comments already received on the initial Draft RMP/EIS have been analyzed and will continue to be considered for the Supplemental Draft RMP/EIS, and such continuing consideration will be highlighted prominently during the upcoming public scoping meetings and other outreach. At least one of the scoping meetings will occur in Mesquite, the gateway community closest to GBNM. Interested stakeholder groups, such as Friends of Gold Butte, local town boards, and the Moapa tribal government, will be

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specifically invited to participate in scoping in addition to their participation in the series of three public information (pre scoping) meetings that already have occurred.

As indicated in the Notice of Intent, the scope of the Supplemental Draft RMP/EIS for the whole Southern Nevada District Planning Area would concern the specific issues of:

- solar energy zones and solar development,
- Areas of Critical Environmental Concern (ACECs),
- lands with wilderness characteristics,
- land tenure adjustments (i.e., land disposals),
- socio economics, and
- specific GBNM issues, such as recreational access, permitting, and resource protection, and as consistent with the designating Proclamation.

Cooperating Agencies

Cooperating Agencies that participated actively in the initial Draft RMP/EIS in 2014 2015, and subsequent review of the Proposed RMP/Administrative Final EIS in 2016, include: five municipalities (all of them in the planning area), both counties (Clark and Nye), one tribe (Moapa Band of Piutes), three State agencies (including Governor's Office), and eight Federal agencies (including Nellis Air Force Base and several Interior bureaus). Thirteen tribal governments or related groups also were consulted or contacted, in addition to the regional BLM Resource Advisory Council (Mo So RAC).

During late 2015 and early 2016, many of these Cooperating Agencies (particularly local governments) provided additional input and written comments as BLM drafted the Proposed RMP. Substantive comments from this recent input informed us on the need for the Supplemental RMP, especially on socio economics and land tenure adjustments. All of the Cooperating Agencies will be re engaged as the RMP advances. Focused outreach to the City of Mesquite and the Virgin Valley Water District (a new Cooperating Agency) also will occur, as these agencies serve the area immediately north of Gold Butte National Monument.

Prominent Issues and Positions of Interested Parties

As mentioned above, several aspects of the initial Draft RMP/EIS received substantive comments and significant public interest, summarized below for some of the more prominent issues and their status in the current administrative draft of the PRMP/FEIS. These issues are drivers that warrant the need for a Supplemental RMP.

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Areas of Critical Environmental Concern: The current draft identifies 37 ACECs (retain 21 existing and establish 17 new) that were nominated internally and externally. To address landscape planning continuity with ACECs across the California border, the Supplemental Draft RMP/EIS and the PRMP/FEIS will include an additional map exhibit that depicts planning continuity with the contiguous Desert Renewable Energy Conservation Plan (DRECP), recently completed by BLM in September 2016. Depending on the stakeholder perspective, designation of

ACECs may allow for additional protection of natural resources (mainly sensitive species or cultural sites) or be considered a hindrance to energy development, recreation, rights of ways, and/or lands for disposal.

Land Disposals: The current draft of the Proposed RMP identifies 118,466 acres for disposal, of which 59,174 acres are legislatively designated or required. The lands identified for disposal have been reduced in the Proposed RMP from the No Action and Preferred Alternatives of the Draft RMP, mainly because of concerns regarding the possible adverse effects to groundwater dependent species, such as the endangered Devils Hole Pupfish and Moapa Dace. The two County governments have expressed concern that the reduction in areas for disposal would limit future urban development opportunities unless the RMP were amended in future years to allow for additional or different land disposal areas. For the mainly Nye County portion of the RMP planning area and to inform substantially on disposal options in the Supplemental RMP, a revised groundwater model is being prepared by US Geological Survey (*Death Valley Regional Flow System, version 3.0*), which represents the best available science. The Clark County portion of the planning area is largely covered by other groundwater models approved by the Nevada State Engineer Office, the agency with jurisdiction over water resources.

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Lands with Wilderness Characteristics: The initial Draft RMP/EIS identified 21 areas or units (242,214 acres total) that possess wilderness character, based upon field work completed during 2010 2011 and largely focusing on units that were nominated then by public advocacy organizations. Public comments subsequently received on the initial Draft RMP/EIS in 2015 correctly indicated that BLM had not completed a comprehensive wilderness character inventory for the entire Planning Area, to be consistent with BLM Manual 6310. In response to these substantive public comments, additional inventory field work has been conducted, and the entire inventory for the Planning Area may be finished by late 2017. Consistent with BLM Manual 6320, the Supplemental RMP process will identify which inventoried units are to be managed for wilderness character versus other options for multiple uses, following scoping and public comment. Depending on the stakeholder perspective, these land use decisions may allow for protection of wilderness character or be considered a hindrance to mineral and renewable energy development, recreation, rights of way, and/or lands for disposal.

Renewable Energy: In addition to the two existing Solar Energy Zones (SEZ) identified in the Solar Energy Development Programmatic EIS (2012), which amended the currently applicable RMP (1998), the Proposed RMP identifies three additional SEZs. The PRMP considered the 2015 solar energy market analysis by National Renewable Energy Laboratory. With input from the BLM Zonal Economist, the Proposed RMP also is incorporating current socio economic conditions discussed with local Cooperating Agencies. Public workshops conducted by BLM to address solar energy issues are anticipated to be held in mid 2017 as focused discussions during the scoping meetings. Positions of stakeholder groups are outlined below.

- **Environmental Groups.** Some organizations have expressed concerns that the identification protocols in the Solar Development PEIS (2012) for identifying new SEZs were not followed and that the Draft RMP/EIS did not provide sufficient NEPA analysis

of the resource impacts of the alternatives.

- **Solar Industry.** Some industry groups have also expressed concerns that the new proposed SEZs were located without industry input and would be cost prohibitive, and that the proposed SEZs did not provide for connectivity to nearby electric transmission corridors. Additionally, the number of acres for exclusion has increased and the solar variance areas have decreased from the Solar Development PEIS (2012) and may be perceived by industry as limiting the opportunity for development.
- **Tribal Governments.** During early January 2017, a concept was proposed via BLM Washington Office where Moapa tribal lands also could be addressed in the Supplemental RMP concerning solar energy issues. That approach may be feasible considering the nexus to electric transmission and solar development on the surrounding BLM lands. However, Bureau of Indian Affairs (BIA) would remain under NEPA as the Lead Federal Agency for any specific project on Moapa tribal lands but BIA later could adopt or tier off the FEIS prepared by BLM.

Gold Butte National Monument: The Supplemental Draft RMP/EIS will evaluate the objects and values of GBNM and address preliminary issues outlined below as internal scoping questions, in addition to other issues that may emerge later through public scoping.

- **Lands and Realty.** What management actions are necessary to ensure that future water delivery facilities from valid existing water rights can be developed, operated, and maintained, while protecting resources?
- **Cultural and Historic Resources.** How should the cultural or historic resources and traditional cultural sites of the area be protected, preserved, or restored, while still allowing for appropriate public visitation, outreach, and educational efforts? What level of management should the BLM apply to restore and enhance post contact historical resources?
- **Tribal Resources.** What management measures are needed to ensure continuation of tribal activities and traditional use of sacred sites?
- **Wildlife and Special Status Species.** What management is needed to restore, maintain, or enhance priority species and their habitats, including critical habitat for listed species, such as the desert tortoise?
- **Vegetation Resources.** What goals, objectives, and management actions are necessary to maintain and improve vegetation, biological crusts, and native plant communities? Which treatments should be considered to reduce the spread of exotic or invasive species?
- **Recreation.** How will areas of high visitation be managed to protect sensitive resources? How should future Special Recreation Permits be managed? Are any facilities, such as campgrounds or trails, needed for current recreation use, or should the issues be deferred to a detailed, implementation level recreation plan?

Other Issues: Several other key issues have emerged during the initial planning process, and are highlighted below. They always have been prominent issues and are not necessarily driving the

specific needs for a Supplemental RMP but will be addressed in the PRMP/FEIS.

- **Travel and Transportation.** The current administrative draft of the PRMP/FEIS changes and clarifies off highway vehicle (OHV) allocations from “Limited to existing roads, trails, and dry washes” to “Limited to designated routes” which includes thousands of miles of existing routes in the Planning Area. These proposed allocations may be considered by some public stakeholders as a way to restrict access to public lands, and were a prominent topic of the public comments from 2015 and earlier. Consistent with updated policy (Manual 1626), travel management will be completed as an implementation level plan after the RMP is concluded. The travel management plan for the area of the GBNM and the adjacent ACEC is already complete since 2008 and will expedite the planning efforts for the GBNM area.
- **Recreational Target Shooting Closure.** The PRMP administrative draft currently features an additional 17,824 acres of closure area within the proposed Logandale Special Recreation Management Area. This proposed Recreation Management Area (see blue area on attached map) features an extensive network of Off Highway Vehicle (OHV) trails, near a growing suburban area in the unincorporated town of Moapa Valley. The purpose of the proposed shooting closure, which does not affect hunting, is to protect persons and property in this intensively used recreation area at an urban interface. This proposed closure was coordinated with the national Shooting Sports Roundtable group. Additional comments received earlier for the Draft RMP stated a preference for no shooting closures and wanted the BLM to find other means to manage or control shooting, such as developing specific recreational shooting sites; however, the current BLM management practice in Nevada is that areas generally are open to shooting by default, unless they are specifically closed.
- **Minerals.** A Minerals Potential Report has been completed for the Planning Area, which informs on options considered for the RMP. For fluid minerals leasing, when compared with the Preferred Alternative in the initial Draft RMP, the current administrative draft of the PRMP/FEIS includes additional areas open to fluid minerals leasing with stipulations for No Surface Occupancy. Southern Nevada, however, shows minimal potential for oil and gas development. For mineral material sites, gravel and aggregate would remain available through the standard permitting process with the appropriate County.

NEXT STEPS

Publication of the Notice of Intent in the Federal Register will initiate the scoping process for the Supplemental Draft RMP/EIS. After scoping and further coordination with Cooperating Agencies and other stakeholders, a Supplemental Draft RMP/EIS would be published for public comment, followed by a Proposed RMP/Final EIS, and eventually two separate Records of Decision (tentative schedule below).

Upon approval of the Notice of Intent, we will determine dates and venues for four or five public

scoping meetings to be held throughout the Planning Area, including a meeting in Mesquite (closest city and gateway community) to highlight issues most pertinent to GBNM.

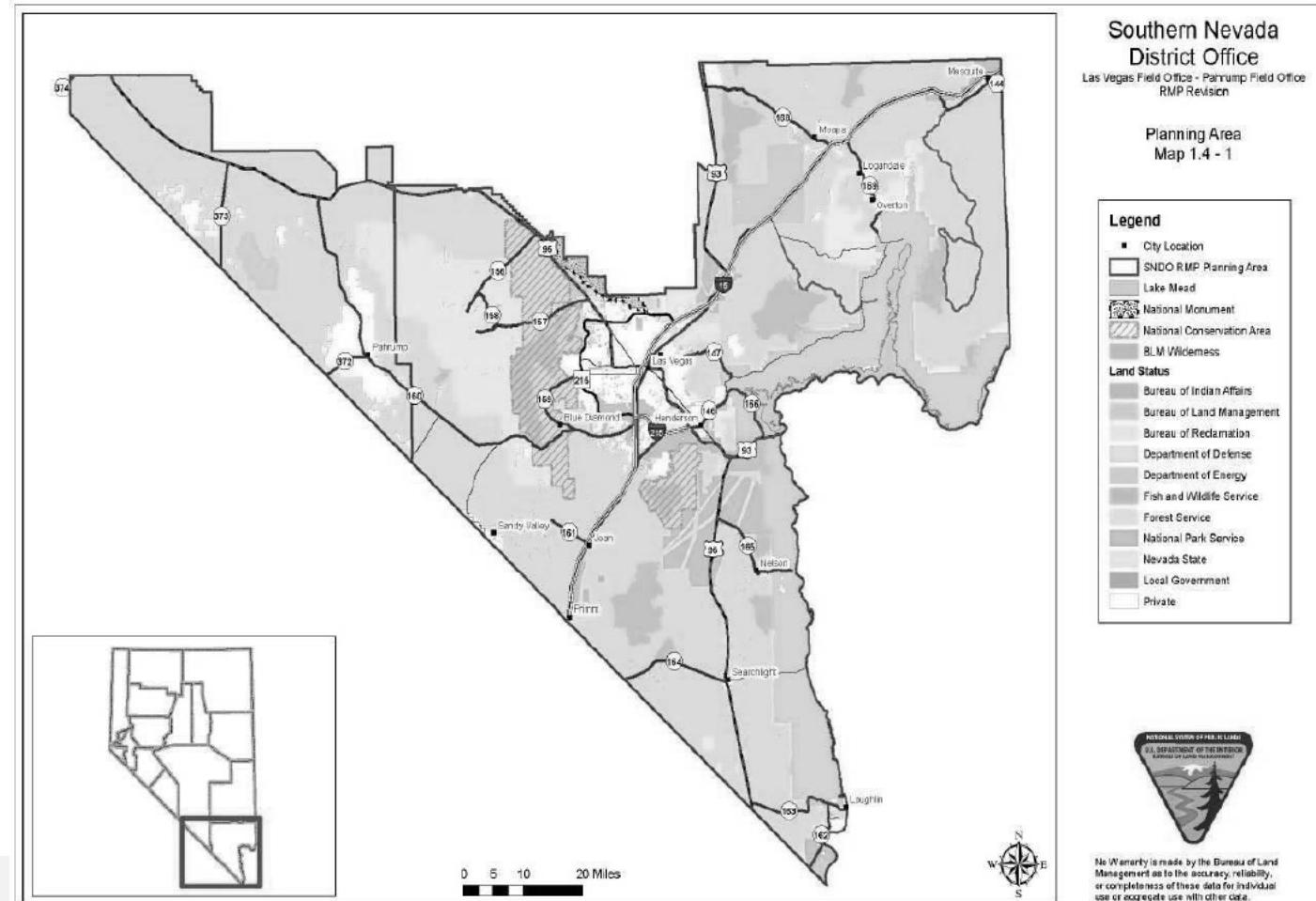
Status & Schedule

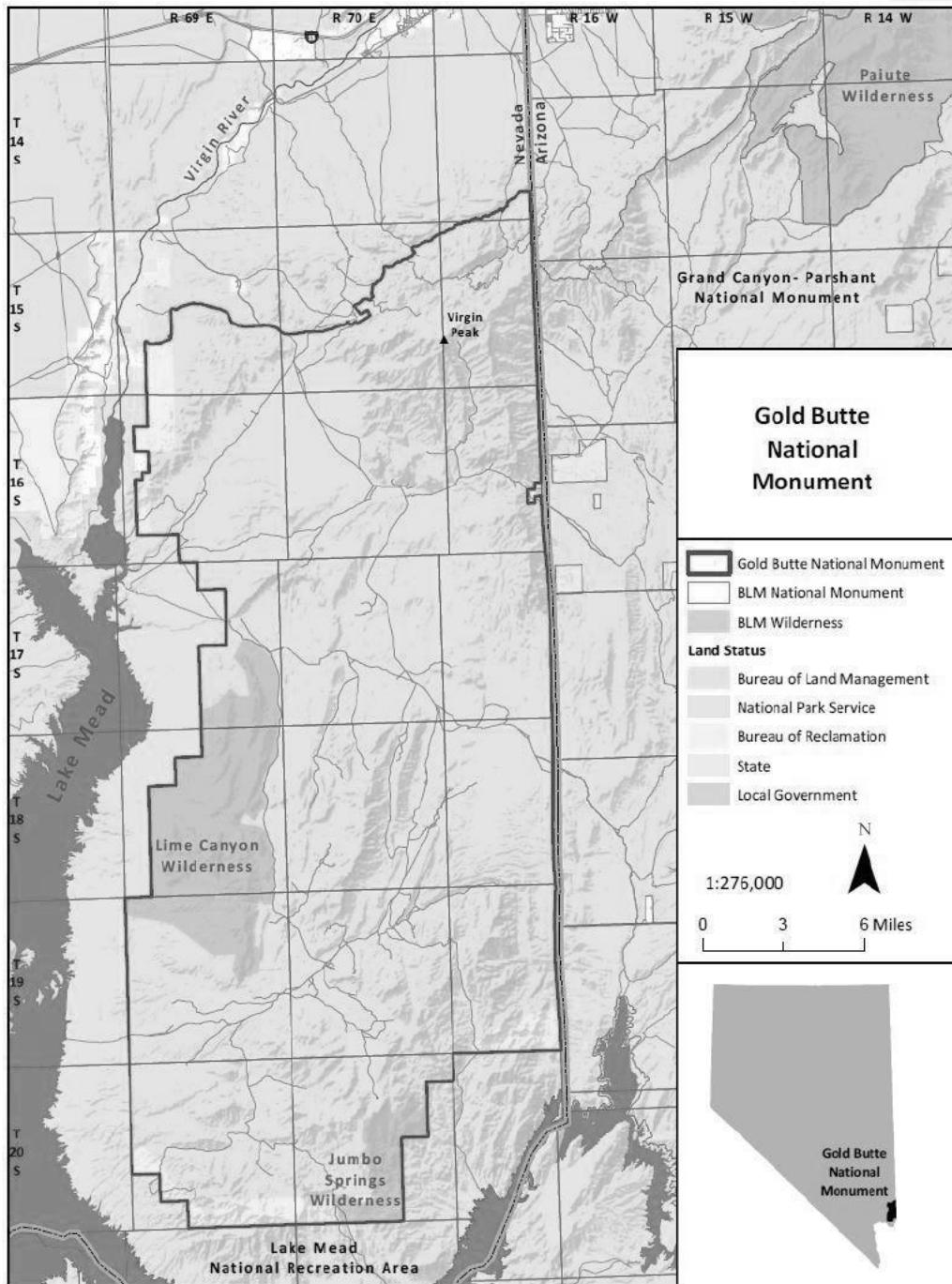
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|---|------------|
| ▪ Initial Public Scoping and Notice of Intent | Jan. 2010 |
| ▪ Initial Draft RMP and Notice of Availability | Oct. 2014 |
| ▪ Initial Public Comment Period Ended (150 days) | Mar. 2015 |
| ▪ Admin. Draft Alternatives for PRMP presented to Cooperating Agencies | May 2016 |
| ▪ Admin. Draft Alternatives for PRMP reviewed by Nevada State Office | June 2016 |
| ▪ RMP process paused for internal review | July 2016 |
| ▪ <i>Supplemental Public Scoping and NOI (60-day comment period begins)</i> | TBD |
| ▪ Admin. version, Supplemental Draft RMP/EIS, potential completion | Feb. 2018 |
| ▪ Public version, Supplemental Draft RMP/EIS, potential Notice of Availability | April 2018 |
| ▪ Admin. Draft Proposed RMP/Final EIS potential completion | Sep. 2018 |
| ▪ Proposed RMP/Final EIS, potential review by Washington Office | Sep. 2018 |
| ▪ Proposed RMP/Final EIS potential Notice of Availability, start Protest Period | Nov. 2018 |
| ▪ Potential Record of Decision, covering Las Vegas and Pahrump Field Offices | FY19 |
| ▪ Potential Record of Decision, covering Gold Butte National Monument | FY20 |

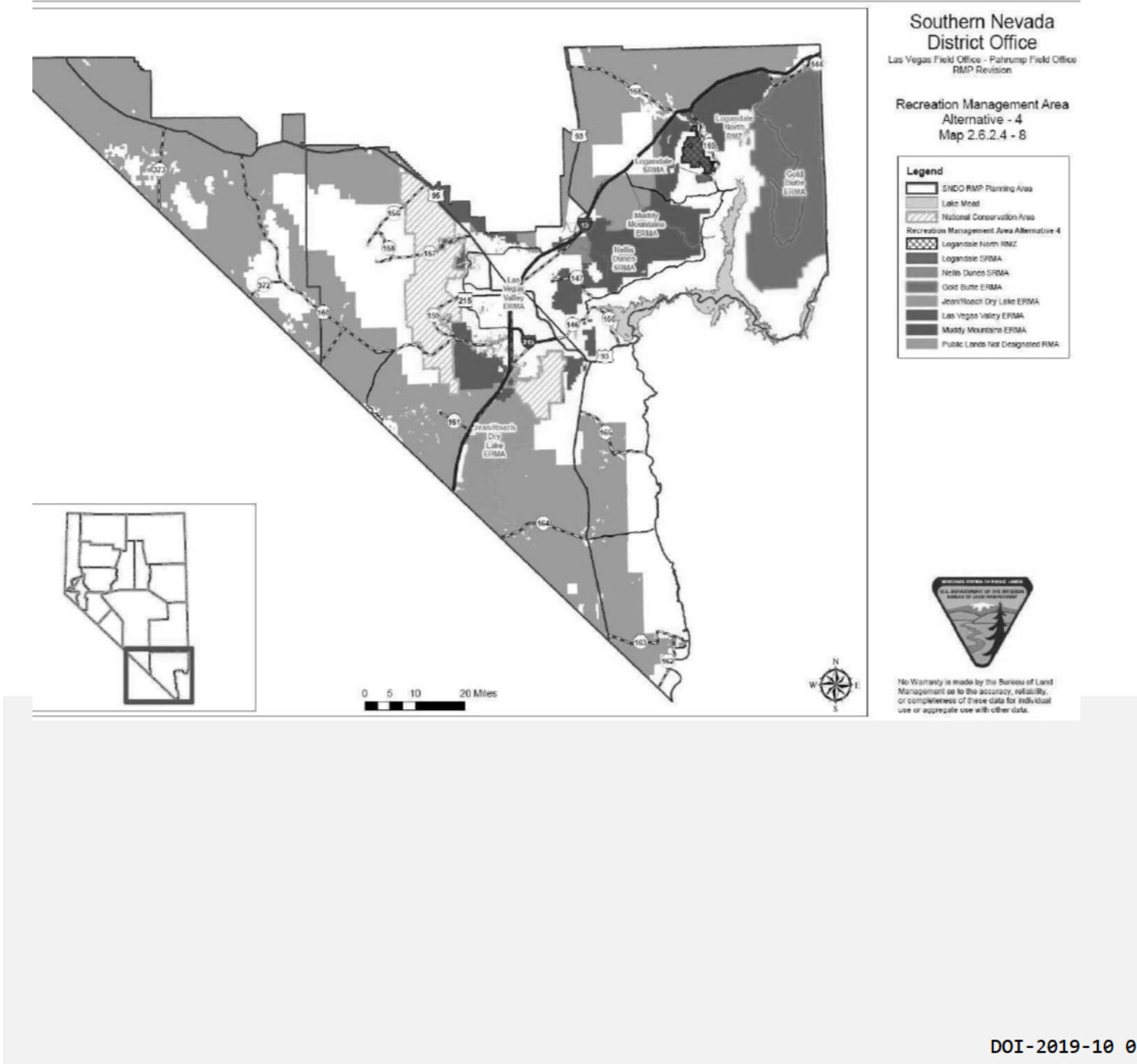
ATTACHMENTS

- Map of Southern Nevada District Planning Area
- Map of proposed Recreation Management Areas, including Logandale SRMA
- Map of Gold Butte National Monument









Briefing Paper

1. State Office

Nevada

2. What is the title of this notice?

Notice of Intent to Prepare a Supplement to the Draft Resource Management Plan and Associated Draft Environmental Impact Statement for the Southern Nevada District Planning Area, comprising the Las Vegas and Pahrump Field Offices and Gold Butte National Monument

3. What are the key issues raised by the underlying decision documents for this notice?

Solar energy zones and solar development, Areas of Critical Environmental Concern (ACECs), lands with wilderness characteristics, land tenure adjustments (i.e., land disposals), and socio economics. Issues specific to Gold Butte National Monument, designated by Presidential Proclamation on December 28, 2016.

4. Who are the primary users affected by or parties interested in the underlying decisions or actions? What are their concerns?

Environmental Groups resource concerns
Solar Industry solar energy development potential
Recreation limitation/expansion of recreation opportunities
Local Governments socioeconomic impacts, land allocations
State Agencies socioeconomic impacts, land allocations
Tribal Governments tribal and tribal resource impacts
Water Districts water use issues

5. Is tribal consultation appropriate under E.O. 13175 or other authorities? Will the proposed action potentially impact tribes or tribal lands, or generate their interest? If so, what consultation or other communication/outreach are you planning?

Yes. The proposed actions on the RMP should not directly affect tribes or tribal lands. Tribal Consultation letters should be sent to the following Tribes:

Cedar Band, Paiute Indian Tribe of Utah
Kaibab Paiute Tribe
Chemehuevi Indian Tribe
Kanosh Band, Paiute Indian Tribes of Utah
Colorado River Indian Tribes
Las Vegas Paiute Tribe
Fort Mojave Indian Tribe
Moapa Band of Paiutes

Hualapai Tribal Council
*Pahrump Paiute Tribe
Indian Peaks Band, Piute Indian Tribes of Utah
Timbisha Shoshone Tribe
Inter Tribal Council of Nevada

*Not a federally recognized tribe

6. Will this notice be controversial?

Yes. Environmental groups and the solar industry have expressed concern over the identification of new Solar Energy Zones. The two County governments have expressed concern that the reduction in areas for disposal would limit future urban development opportunities. Depending on the stakeholder perspective, designation of ACECs may allow for additional protection of natural resources (mainly sensitive species or cultural sites) or be considered a hindrance to energy development, recreation, rights of ways, and/or lands for disposal. The designation of Gold Butte National Monument is also controversial.

7. What will the underlying decision or action change? (Summarize changes to policy, management practices, allowable uses, differences between draft and final, etc.)

This action is only to announce the intent to prepare a supplement to the Draft RMP/EIS and announce the initiation of the public scoping process.

8. Will this notice need communications materials, e.g., a press release, communication plan? If so, enclose these materials with the notice package submitted.

Yes. Communication materials are included.

9. What are the reasons for the timing of the notice and the consequence, if any, of delaying or canceling the release?

Canceling the notice would prevent the Supplemental RMP/EIS project from proceeding forward.

10. How has this been analyzed under the National Environmental Policy Act (NEPA)?

This action is to initiate the scoping process for an EIS.

11. Is there any additional pertinent, descriptive information that reviewers need to know or would increase understanding?

Throughout the planning area some lands designated for special use by BLM have been proposed to Congress for disposal.

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12. List the names and positions of the people who have prepared, reviewed, and approved the notice and the underlying decisions and documents.

Southern Nevada District

John Asselin, Public Affairs
Tim Smith, District Manager
Erick Kurkowski, Associate District Manager

Las Vegas Field Office

Gayle Marrs Smith, Field Manager
James Kirk, Project Manager

Pahrump Field Office

Deborah MacNeill, Field Manager
Susan Farkas, Planning and Environmental Coordinator

Nevada State Office

David Pritchett, Planning and Compliance
Steve Clutter, Chief of Communications
Chris Rose, Public Affairs Specialist
Marci Todd, Associate State Director
John Ruhs, State Director

13. Authorizing signature of State Office or Center Budget Officer, or Washington Office Resource Advisor certifying that the cost code on the Federal Register notice is accurate and valid.

(signature)

(print name and date)